

Exhibit 1

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October 9, 2013

VIA HAND DELIVERY and ELECTRONIC MAIL

Chris J. Tardio
CJ Gideon
Matt Cline
Gideon Cooper & Essary
315 Deaderick St., Suite 1100
Nashville, Tennessee 37238

**Re: New England Compounding Center Litigation, MDL No. 2419
Complaints filed in United States District Court for the
Middle District of Tennessee**

Dear Gentlemen:

Please find enclosed the common discovery requests propounded upon your clients and service copies of discovery served upon other defendants. You can return written discovery responses and responsive documents to me. Further, and pursuant to Judge Saylor's Order of June 21, 2013 (Dkt. No. 192) and the PSC's subsequently filed notice (Dkt. No. 224), copies of responsive documents should be produced to the appropriate vendors. Enclosed herewith is U.S. Legal's production specs that should be used in producing responsive documents to that vendor.

I am also repeating my request that you provide me with available dates for depositions of Dr. John W. Culclasure, Debra Schamberg, and a 30(b)(6) date for each of the entities you represent. We believe that we can be ready to take these depositions in December.

Further, I am repeating my request that you provide an update on the approximately 50,000 emails you have previously segregated pertinent to this litigation as part of the discovery process in the Wayne Reed case, originally filed in state court.

Finally, we have not heard back from you with regards to our request for your initial disclosures. Please advise when we may expect them.

Letter to Chris J. Tardio
September 25, 2013
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Should you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



J. GERARD STRANCH, IV
Member of PSC and Tennessee Chair

Enclosures as stated

cc: Kristen Johnson Parker
Parties Listed on Certificate of Service on the Enclosed Discovery Requests